

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

City of Chicago,

Plaintiff,

v.

DoorDash, Inc. and Caviar, LLC,

Defendants.

Civil Action No. 1:21-cv-05162

Hon. Jeremy C. Daniel
Magistrate Judge Jeffrey T. Gilbert

JOINT STATUS REPORT

Pursuant to this Court's orders dated December 23, 2022 (ECF No. 90) and December 19, 2022 (ECF No. 87) directing the parties to file a status report seven days after each rolling production deadline to provide information about the last rolling production, what has been produced to date in total, and what remains to be produced, the parties hereby file this Joint Status Report concerning the February 2, 2024 production deadline.

I. Status of the City's Document Productions

A. Documents Produced by the City To Date

As of February 9, the City has produced 6,932 documents, totaling 54,741 pages, in rolling productions. The City's prior productions are described in more detail in the prior joint status reports (ECF Nos. 96, 101, 105, 109, 115, 151, 164, 174, 194, 200, 202, 216, 230, 234, 242, 246, 249, 250).

B. Remaining Documents to be Produced

On January 15, DoorDash served an additional set of RFPs (Nos. 107-115), to which the City is in the process of responding. On January 31, DoorDash requested that the City supplement its response to several document requests and proposed narrowed versions of several others to which the City had objected; the City is evaluating those proposals. In the previous status report, the City indicated that it was confirming whether there were relevant documents responsive to RFP No. 89; City has now determined that there are no relevant documents and will stand on its objections. The City continues to review its overall production for completeness. The City is in the process of compiling a privilege log, and it will meet and confer with DoorDash regarding any perceived inadequacies in that log.

II. Status of DoorDash's Document Productions

A. Documents Produced by DoorDash to Date

On February 2, 2024, DoorDash produced DD_CHICAGO_0036237, which contains data responsive to the City's RFP No. 61. Since August 2022, DoorDash has produced a total of 7,073 documents and 36,237 pages across 24 productions. The documents produced to date include:

- Custodial documents responsive to the City's document requests relating to minimum amount promotional discounts, non-partner restaurants, Dasher pay, consumer fees, and menu pricing;
- Documents identified in known non-custodial locations;
- Documents identified from DoorDash's review of documents produced in related investigations and litigations;
- Spreadsheets that were created in order to respond to the City's requests for specific data.

As of the date of this report, DoorDash has produced documents responsive to the majority of the City's requests for production.

B. Remaining Documents to be Produced

DoorDash has substantially completed the production of custodial documents responsive to the portions of DoorDash's custodial search methodology previously agreed upon by the parties and addressed by the Court's November 6 Order, with the exception of a few document families where DoorDash is working through technical issues relating to production. DoorDash is also evaluating what it may be able to produce in response to additional requests made by the City, including as to additional search terms, non-custodial email listservs, and Salesforce contacts.

DATED: February 9, 2024

Respectfully submitted,

**CITY OF CHICAGO DEP'T OF LAW,
AFFIRMATIVE LITIGATION
DIVISION**

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